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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

**NORTHWEST ENVIRONMENTAL
DEFENSE CENTER, WILDEARTH
GUARDIANS, and NATIVE FISH
SOCIETY,**

Plaintiffs,

vs.

**U.S. ARMY CORPS OF ENGINEERS and
NATIONAL MARINE FISHERIES
SERVICE,**

Defendants,

and

CITY OF SALEM and MARION COUNTY,

Defendant-Intervenors

Case No. 3:18-cv-00437-JR

**DECLARATION OF JEFF DOSE IN
SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION**

I, Jeff Dose, hereby declare:

1. My name is Jeff Dose, and I make the following statements on the basis of personal knowledge, and if called as a witness I would and could truthfully testify thereto.

2. I have resided in Oregon for 65 of my 67 years. I grew up in Coos Bay and Eugene, Oregon. I have also lived in Medford and now reside in Roseburg, Oregon.

3. I graduated from Sheldon High School in Eugene, then joined the United States Navy. After I was discharged from the Navy, I attended Oregon State University (“OSU”) in Corvallis, Oregon, where I received a Bachelor of Science in fisheries science. Following my graduation, I was employed as a fisheries biologist by the Bureau of Land Management in Montana for two years, then transferred to Medford, Oregon, for seven years. I was subsequently employed by the U.S. Forest Service as a Senior Fisheries Biologist and worked on issues relating to salmon and steelhead in the Umpqua National Forest until my retirement in 2011. All told, I have been professionally involved in efforts to conserve and recover salmon and steelhead in Oregon for over 35 years.

4. I have been a member of WildEarth Guardians (“Guardians”) since I joined in January 2018. Guardians is a 501(c)(3) non-profit organization dedicated to protecting and restoring the wildlife, wild places, wild rivers, and health of the American West. Guardians envisions a world where wildlife and wild places are respected and valued and the world is sustainable for all beings. Guardians’ programs work to ensure that imperiled species receive the protections they need to survive and recover. I joined Guardians because I support its mission, and in particular, its advocacy to protect Oregon’s rivers, including their native salmon and steelhead populations and habitat.

5. I have a strong, longstanding personal interest in the health, viability, and abundance of wild salmon and steelhead populations in the Upper Willamette River watershed. I learned to fish with my brother on the McKenzie and Willamette rivers in the 1960s while growing up in Eugene, and fishing has been an important part of my life since then. I estimate that during that time, I would fish for Chinook salmon and steelhead on various rivers in the Upper Willamette River watershed at least 30 times a year. My experiences on these rivers were

a significant part of what inspired me to study fisheries science at OSU and to become a career fisheries biologist.

6. After I moved away from Eugene, I continued—and still continue—to visit and fish on the Upper Willamette and McKenzie rivers, often with my brother. I estimate that in the past ten years, I have floated the McKenzie 10 times per year, and the Upper Willamette five times per year, on average, with the trips taking place between May and September. I often fish during these float trips, but not always. I plan to continue these float trips for as long as my health permits.

7. As a fish biologist and an outdoorsman, I enjoy knowing that native salmon and steelhead are present when I am recreating in the Upper Willamette River watershed even if I don't actively fish for or catch and release them, because they represent for me something about the incredible resiliency and persistence of truly wild anadromous fish. Given their integrality to the ecosystem, the presence of these fish contributes to the aesthetic and spiritual pleasure I take from being on the McKenzie and Willamette rivers. Their continued presence is important to my personal health and well-being.

8. In approximately the past ten years, I have experienced first-hand the precipitous decline of the wild populations of these incredible icons, which has caused me great personal sorrow. I have noticed that it has become much harder to catch native Chinook salmon and steelhead on the Upper Willamette and McKenzie rivers, and there are fewer locations where the fishing is good. My own observations of this decline, along with publicly-available scientific data about the decline, have so disheartened me that I no longer fish for Chinook salmon or steelhead on these rivers (even though when I did, I would I release the native fish that I caught) because I feel that I cannot in good conscience do anything that might disturb these fragile populations. I now limit my fishing on the Upper Willamette and McKenzie to trout—but I wish that I could return to fishing for Chinook salmon and steelhead.

9. I understand that this decline is the consequence of societal decisions regarding energy production, flood control, and irrigation in the Upper Willamette River watershed, but as a fishery biologist, angler, and outdoorsman I strongly reject the idea that these considerations

should take precedence over the need to protect and preserve wild salmon and steelhead populations. I am concerned about the impacts to native fish from the Corps' dam operations and from the hatcheries the Corps funds in order to mitigate the negative effects of its dams on salmonid populations. In my professional experience as a fisheries biologist, I believe that these hatchery fish are detrimental to the long-term health of the wild salmonids, because they have lower genetic fitness and compete with wild salmonids for limited food and habitat resources. Thus, mitigation and restoration of wild native fisheries should be accomplished by drastic improvements to fish passage and water conditions, not hatchery production.

10. Like many others in this state concerned with the long-term health of our native fisheries resources, I strongly support the Corps' taking active measures at the dams that it operates in the Upper Willamette River watershed to improve stream flows, water temperature, dissolved gas levels, and fish passage rates. I believe that we are reaching a critical decision point and that if the Corps does not take significant steps to save these fish soon, there will likely be no native Chinook salmon and steelhead left to protect in many parts of the Upper Willamette River watershed. A court order requiring the Corps to implement improvements in the way it operates its dams in the Upper Willamette River watershed would directly address some of my concerns.

11. I personally long for the day when the wild spring Chinook salmon and steelhead populations are so robust that I, and future generations, can fish for and harvest them in good conscience, as I once did.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 27 day of November _____ 2018, in Roseburg, Oregon.

/s/ Jeff Dose_____

Jeff Dose